

**Federal Defenders  
OF NEW YORK, INC.**

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February 4, 2022

**VIA ECF**

The Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Lawrence Ray  
20 Cr. 110 (LJL)**

Dear Judge Liman:

We write on behalf of Lawrence Ray to respectfully request that the Court review Jane Doe 1's medical records and corresponding privilege logs, received pursuant to Rule 17 and orders of the Court, to determine the applicability of the proposed redactions under the psychotherapist-patient privilege.

Pursuant to the Court's order, the defense met and conferred with counsel for Jane Doe 1 on January 28, 2022 regarding the proposed redactions of her medical records. Pursuant to that meeting, counsel for Jane Doe 1 reviewed its redactions for the New York Presbyterian Hospital records and reproduced the records with new proposed redactions along with an updated privilege log. *See* Exs. A, B. In addition, on January 28, 2022, Jane Doe 1 disclosed redacted records from Harlem Bay, which were prepared in substantial part before counsel met and conferred. Earlier today, the defense received a substitute set of Harlem Bay records that have been re-reviewed since counsels' meet and confer, along with a corresponding privilege log. *See* Exs. C, D.

A review of the reproduced records reveals that Jane Doe 1 continues to assert privilege over large swaths of material that the defense maintains is not necessarily privileged. For the reasons stated in the January 10, 2022 court filing, Dkt. 284, the defense respectfully requests the Court review all of Jane Doe 1's medical records to determine the applicability of the proposed redactions under the psychotherapist-patient privilege.

Thank you for your consideration of this matter.

Hon. Lewis J. Liman

Respectfully submitted,

/s/

Marne L. Lenox, Esq.  
Peggy Cross-Goldenberg, Esq.  
Allegra Glashausser, Esq.  
Neil P. Kelly, Esq.

*Counsel for Lawrence Ray*

cc: Counsel of record

# EXHIBITS

REDACTED